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June 26, 2015

Via email: Julie.Saare-Edmonds@water.ca.gov

Julie Saare-Edmonds
Senior Environmental Scientist
California Department of Water Resources
Urban Water Use Efficiency Unit
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Comment Letter – Draft Model Water Efficient Landscape Ordinance

Dear Ms. Saare-Edmonds,

Eastern Municipal Water District (“Eastern”) appreciates the efforts of the Department of Water Resources in updating the Model Water Efficient Landscape Ordinance. Eastern is a strong supporter of water use efficiency and has already taken steps to increase efficiency in new landscape installed in our service area.

Thank you for the opportunity to review the Model Water Efficient Landscape Ordinance. Eastern would like to offer the following comments on the draft for your consideration:

- **Sections 490 and 492.13** – Define an irrigation efficiency factor that is not achievable. Eastern recommends maintaining the 0.71 irrigation efficiency standard.
- **Section 492.7** – Dedicated landscape meters should be required only for all projects greater than 2,500 square feet except for single-family residences. Dedicated metering or sub-metering should be required for single family residences only after a stakeholder group has reviewed the effectiveness of sub-metering in single-family residential homes, developed standards for implementation, and determined who will be responsible for the maintenance of sub metering. In the event metering or sub-metering is required, they should be required only for single-family projects greater than 10,000 square feet.
- **Section 492.15** – Eastern recommends the language be changed to recognize that when a fully subscribed recycled water system is in place, gray water use does not always result in additional water use efficiency. Land agencies should be encouraged to work with recycled water purveyors to help define appropriate areas for extensive gray water use.

Mailing Address: Post Office Box 8300 Perris, CA 92572-8300 Telephone: (951) 928-3777 Fax: (951) 928-6177
Location: 2270 Trumble Road Perris, CA 92570 Internet: www.emwd.org

Eastern does support many of the water saving elements in the draft Model Water Efficient Landscape Ordinance including the reduction in the Maximum Applied Water Allowance and the restrictions on new turf.

Thank for your consideration of our comments, if you have any questions please contact me at (951) 928-3777 extension 4307 or lovstede@emwd.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Lovsted", with a long horizontal flourish extending to the right.

Elizabeth Lovsted
Sr. Civil Engineer
Resource Development